



Hearing Statement for Matter 6

Independent Examination of the Hyndburn Local Plan

On behalf of Clowes Development and McDermott Homes

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794-PLN-TRP-00261
Hearing Statement for Matters 6
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1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd are instructed jointly by Clowes Developments (UK) Limited and McDermott Homes (hereafter referred to as the Clients) to make representations to the Independent Examination of the Hyndburn Local Plan Inspector's Matters, Issues and Questions for Examination.
- 1.2 As the Council and the Inspector will be aware, our Clients have a live planning application on the former Huncoat Power Station site (Ref: 11/21/0657) which forms part of the Huncoat Garden Village. The application seeks permission for the "Proposed redevelopment for up to 360 residential units, together with associated landscaping, open space, access and infrastructure".
- 1.3 Representations for our Client are be led by Pegasus Group, however RPS are providing support in relation to highways and transportation matters. It specifically covers Matter 6 and provides further technical justification to the position.
- 1.4 The main aim of this Hearing Statement is to support the site at Huncoat Power Station, identified as a formal residential allocation, as part of the Huncoat Garden Village. This Hearing Statement seeks to clarify our Clients' position in relation to the review of the Plan to ensure that it is positively prepared, justified by evidence, and deliverable and succinct and can move to adoption.

Issue 6: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for transport and infrastructure?

Q6.6 The evidence demonstrates that J8 of the M65 will require improvement to enable the Local Plan growth to proceed, in particular the Huncoat Garden Village. The Statement of Common Ground with National Highways states that work is ongoing to progress modelling and feasibility appraisal work for the junction. This will feed into an assessment of whether a scheme is deliverable and whether it can be justified for funding to be allocated through the Road Investment Strategy (RIS3) for the scheme. What is the current progress with this work and what are the timescales involved?

- 1.5 As part of the application process for the Power Station site, we've been actively engaging with National Highways regarding the necessary improvements to Junction 8 of the M65 and the specific impact of our development on it. While the overall assessment of Local Plan growth has concluded that Junction 8 will require upgrades to mitigate cumulative impacts, our view is that there is scope to bring forward early-stage development ahead of these improvements being delivered. Further detail on this is provided in our response to Question 6.9 below.

Q6.9 is a phasing strategy for Huncoat Garden Village and other developments planned, e.g. the extension to Altham business Park EMP3, being investigated?

- 1.6 It is our client's position that improvements to Junction 8 of the M65 do not need to be in place before the Power Station site can be delivered. Transport evidence has been prepared to demonstrate that the first phase of development can proceed independently, allowing for the early delivery of homes ahead of the completion of Junction 8 improvements.
- 1.7 Our assessment of the site's impact on Junction 8 is set out in the attached technical note, see **Appendix 1**, which responds to comments raised by National Highways in relation to the application. Based on this assessment, the level of impact at the junction is minimal and should not be considered sufficient to prevent early-stage development from coming forward while the wider junction improvement scheme is being designed and implemented.

Appendices

Appendix 1 – National Highways Technical Note

TECHNICAL NOTE

Project Title: 794-PLN-TRP-00261 Former Huncoat Power Station

Report Reference: National Highways Response

Date: 08/07/2025

Introduction

- 1.1 RPS has been instructed by Clowes Developments (UK) Ltd and McDermott Homes Ltd to provide transport planning consultancy advice in connection with an outline planning application for residential development on the former Huncoat Power Station site. The site is located to the northeast of the village of Huncoat, within Hyndburn Borough Council's (HBC) administrative area. The redevelopment of the power station site forms the first phase of the Huncoat Garden Village (HGV) Masterplan and aims to comprise of up to 360 residential units.
- 1.2 The planning application was made in 2021, reference 11/21/0657. The original application considered up to 451 residential units, however a revision to the application has been made so that the proposal is for up to 360 residential units.
- 1.3 This technical note is issued in response to feedback from National Highways (NH) (Ref: 11/21/0657), dated 6 June 2025. This response can be found in **Appendix 1**. The response recommended that planning permission should not be granted for a specified period, stating that the application should not be approved before 29 September 2025 due to insufficient information.

Response

- 1.4 The following gives an informative response to the NH queries raised. An updated Transport Assessment is in preparation which will deal with the updated development content and assessment of local roads. This note provides the overall approach for agreement with NH.

Policy Content

- 1.5 NH commented that the previous application had not provided information fully compliant with either **DfT Policy Circular 01/2022 'The strategic road network and the delivery of sustainable development'**, or the **Strategic Road Network: Planning for the future**. An updated TA will include key text explaining both key policy documents. RPS understand the importance of integrating these throughout the transport planning process. Below gives a key understanding of what the key policies provide.
- 1.6 DfT Circular 01/2022, 'Strategic Road Network and the Delivery of Sustainable Development', outlines the role of National Highways in the planning system to ensure that development

supports sustainability while safeguarding the performance of the Strategic Road Network (SRN). The Circular is a key material consideration for developments that may impact the SRN, such as housing proposals located near major roads.

- 1.7 The document highlights that development should be planned to support sustainable economic growth without undermining the efficiency or safety of the SRN. A central concept introduced is the “vision and validate” approach, which encourages local planning authorities and developers to proactively consider how future development can reduce reliance on private car use. This involves integrating land use and transport planning to promote active travel, improve public transport accessibility, and implement demand management strategies.
- 1.8 The Circular supports the delivery of zero-emission vehicle infrastructure and encourages the provision of roadside facilities that align with broader sustainability goals. In the context of housing developments near the SRN, it is essential that planning applications reflect the principles of the Circular. This includes minimising car dependency through thoughtful design and location, providing comprehensive transport assessments and mitigation strategies, and engaging with National Highways to address any potential impacts on the SRN.
- 1.9 By adhering to these principles, the new residential development can contribute positively to sustainable development objectives while ensuring the continued functionality and safety of the strategic transport network.
- 1.10 The Strategic Road Network: Planning for the Future outlines how England’s SRN should be managed and developed to support both sustainable development and economic growth. It provides guidance for developers, local planning authorities, and stakeholders on how to effectively engage with NH when planning developments that may impact the SRN.
- 1.11 The document’s aim is to ensure the SRN remains safe, efficient, and reliable, while also accommodating growth. It recognises the SRN as a vital national asset for the movement of people and goods and seeks to balance this function with the demands of development.
- 1.12 It states that early engagement with NH is important during the planning process to identify potential impacts and necessary mitigation.
- 1.13 It stresses the need for evidence-based planning, requiring robust transport assessments and travel plans to demonstrate how any impacts on the SRN will be managed. Similar to that of the Circular, the policy also supports development that reduces car dependency and promotes sustainable transport, in line with the NPPF. It stresses that a development must not compromise the safety or operational efficiency of the SRN, and where impacts are identified, appropriate mitigation, such as junction upgrades or demand management, must be secured.
- 1.14 For housing developments near the SRN, this framework requires a design that minimises traffic impacts, encourages sustainable travel, and includes effective mitigation measures. Early and continuous engagement with NH is essential.

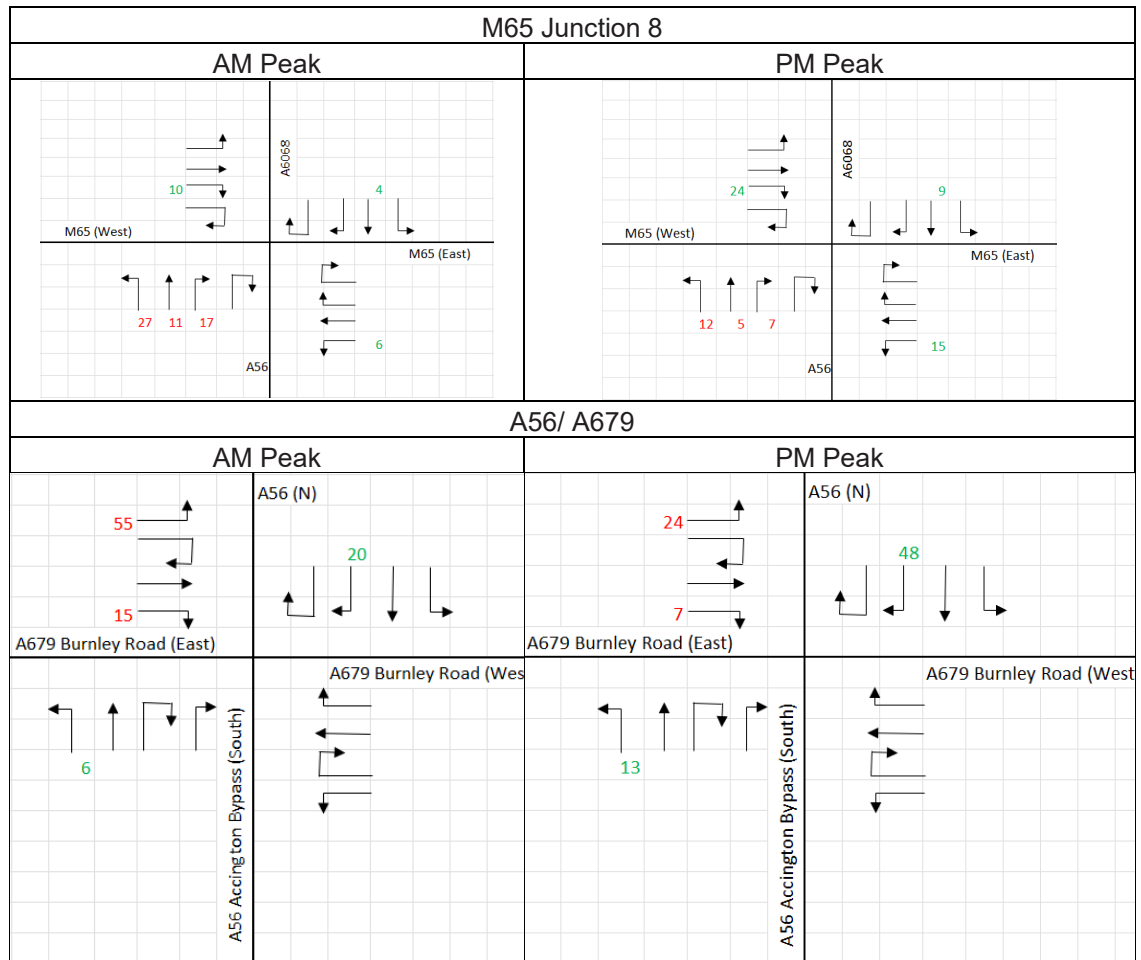
NH Junction Analysis

- 1.15 As mentioned in the response Junction 8 of the M65 motorway has not been included within the assessment, in both terms of operating performance and safety. We note the comment that states:

“An understanding of the development impact at this location is essential given the proximity of the proposed development and the performance of how this junction operates.”

- 1.16 The study area has been expanded to include the two main junctions on the M56 and the A56. A distribution assessment has been carried out using 2011 Census data (WF01BEW – Location of Usual Residence and Place of Work). These calculations offer a representation of current travel patterns from the area surrounding the site, indicating the directions typically taken by commuters.
- 1.17 **Appendix 2** includes both a percentage distribution diagram and AM and PM peak hour flow diagrams, based on TRICS data from comparable sites. These peak hour flow diagrams help to give an initial understanding of how many additional vehicles will be arriving and departing during the busies periods on the local network and the SRN.
- 1.18 As can be seen from the peak hour figures the majority of traffic is predicted to turn right into the site from Altham Lane when arriving and turning left onto Altham Lane when departing. The census data shows the 95% of vehicles will travel in this direction. The additional 5% will travel north on Altham Lane to Altham.
- 1.19 The distributing arrival and departure roads and their percentages can be found below:
- A679 Burnley Road (West): 0% Arrivals & 0% Departures
 - M65 (East): 14% Arrivals & 14% Departures
 - A6068: 9% Arrivals & 9% Departures
 - M65 (West): 23% Arrivals & 23% Departures
 - A56 Accington Bypass (South): 13% Arrivals & 13% Departures
 - Altham Lane: 5% Arrivals & 5% Departures
 - Whinney Hill Road (West): 20% Arrivals & 20% Departures
 - A679 Burnley Road (West): 17% Arrivals & 17% Departures
 - Burnley Lane: 0% Arrivals & 0% Departures

1.20 The following figures provides development-related vehicle movements in the AM and PM peak at the A56/ A679 junction and M65 Junction 8:



1.21 As can be seen from the flow diagrams above there is a negligible amount of traffic at both junctions. Less than a vehicle per minute in any direction at the A56 / A679 junction. Modelling of these junctions in the previous TA has already established that there are no capacity concerns as a result of the development flows.

1.22 At M65 Junction 8, less than 30 vehicles per hour (a vehicle every 2 minutes) is added onto any turning movement at the junction. This is a level of change that RPS consider under a threshold that requires detailed analysis. Planning Practice Guidance states that

‘Travel Plans, Transport Assessments and Statements should be:

proportionate to the size and scope of the proposed development to which they relate and build on existing information wherever possible’

1.23 We do not believe that the level of impact justifies further detailed capacity or safety analysis at Junction 8.

STATS19 – Collision Data

- 1.24 The response indicates that a full safety analysis based on STATS19 reporting should be included. As part of the forthcoming Transport Assessment, a comprehensive analysis of road casualty statistics will be undertaken using STATS19 data.
- 1.25 In March 2021 Highways England, now National Highways, presented a report by WSP which investigated Junction 8 of the M65¹. Section 8 investigated Personal Injury Collisions (PICs) data using the STATS19 database from Lancashire Constabulary. The data focused on identifying trends and contributing factors such as road layout, driver behaviour, and weather conditions.
- 1.26 The study area was selected in consultation with Lancashire County Council and covered a period from 2013 to 2019. Although the data only includes incidents attended by police, it revealed a total of 103 collisions, with M65 Junction 8 consistently highlighted in previous studies as a high-risk location.
- 1.27 Three potential collision clusters were identified:
- The A56 northern approach to M65 Junction 8
 - The northern circulatory of M65 Junction 8
 - The A56 southbound exit from the junction
- 1.28 While some clusters showed recurring issues like poor manoeuvres or driver awareness failures, no single common factor was found across all incidents. Two fatalities were also recorded during the study period, each attributed to specific, isolated causes.
- 1.29 The findings suggest that while some patterns exist, particularly around driver behaviour, further investigation and potential mitigation measures may be warranted to improve safety at this junction.
- 1.30 The WSP report states that mitigation measures need to be applied at this junction to cope with current and future demand. The report also details later that options testing has been undertaken which identified three options, all aimed at improving congestion but also in-turn safety.
- 1.31 We understand that NH continue working towards designing and delivering improvements at this junction.
- 1.32 As set out above, RPS do not consider the change in flow requires a more detailed consideration of mitigation measures given the low predicted change in flow at the junction in peak hours. A material change in accidents rates is considered unlikely. Consequently, there is no need to hold up consent for this first phase of work for the Huncoat Garden Village.

¹ [HBC7.006_70075017-001-M65-Junction-8-Study-Report-210331.pdf](#)

Local Pedestrian Infrastructure

- 1.33 The response provided the following statement about local pedestrian infrastructure:
- “The TA provides a description of the existing provision for pedestrians across the A56, including the crossing just to the south of M65 Junction 8, however no further evidence is provided. There are two public rights of way in the vicinity of the proposed development (Footpaths 53 and 39) that cross the A56 at-grade. The TA should consider the existing pedestrian demand at these locations, the forecast increase in demand at these locations generated by the proposed development, and the suitability of the existing provision for the forecast demand”**
- 1.34 The current pedestrian facilities are sparse in the area, this is due to the current nature of the site and the surrounding area. There is currently no real desire for pedestrians, apart from those of recreation, to be walking near to the site as it is derelict. Admittedly with the introduction of more homes this will increase the number of pedestrian movements. However, the main desire line for the residents will be travel so the south to Huncoat centre and towards the train station.
- 1.35 As mentioned previously WSP undertook a M65 Junction 8 report in 2021, section 2.4 gives details on their findings on Non-Motorised User Facilities (NMU).
- 1.36 In short, an assessment of NMU facilities in the study area of the WPS report were based on Highways England Watchman reports and Lancashire County Council data. The analysis indicated that provision is currently poor, particularly at M65 Junction 8. This limited infrastructure is partly attributed to the rural nature of the area and low current demand for walking and cycling. However, the lack of facilities may also be suppressing potential use.
- 1.37 The report states that of particular concern is a PROW crossing the A56 immediately south of M65 Junction 8, which is an uncontrolled at-grade crossing. This requires pedestrians to cross two lanes of high-speed traffic. Although a central refuge is present, the crossing is considered unattractive and potentially unsafe due to the lack of signal control, the national speed limit on the A56, and the narrow central reserve between Vehicle Restraint Systems (VRS).
- 1.38 Section 9 of the WSP report centralises around ‘Forecast for Non-Motorised User Demand’. This section covers the current and future demand for NMUs, specifically pedestrians and cyclists, at M65 Junction 8. The analysis begins by evaluating existing walking and cycling patterns using 2011 Census data and the Propensity to Cycle Tool. The data shows that cycling mode share in the surrounding Middle Super Output Areas is very low, typically around 0.8%, while walking mode share is higher, ranging from 3.2% to 12.9%. Workplace data reflects similar trends, with cycling at around 1% and walking between 6% and 13%.
- 1.39 To estimate existing NMU demand at the junction, the study identifies 16 east-west cycle trips and 26 pedestrian trips that could potentially use M65 Junction 8 as a crossing point. However, due to the availability of more attractive alternative routes (e.g., Burnley Lane, A679 Burnley Road, and the Leeds and Liverpool Canal), it is assumed that only half of these trips actually use the junction. North-south NMU trips are considered unlikely to use the junction due to better alternatives like Altham Lane and Manchester Road.

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- 1.40 The proposed Huncoat Garden Village (HGV) development, comprising approximately 1,500 new homes, will likely increase NMU demand. Using TRICS data and National Travel Survey statistics, the WSP study estimates that the development will generate around 1,140 commuting trips daily, of which a small proportion (based on local mode shares) will be walking or cycling. Applying these proportions, the study forecasts that the HGV development will add approximately 2 cycling and 3 walking trips across M65 Junction 8 during both the AM and PM peak hours. When using the same methodology for 360 houses, it is predicted that there will be 1 walking trip across the M65 Junction motorway during each of the AM and PM peak hours.
- 1.41 For off-peak periods, the WSP study for 1500 units estimated an additional 20 NMU trips per hour across the junction, assuming 10% of total leisure trips from the development would use this route. this is a nominal assumption and is considered to be robust, given the availability of other routes that do not need to cross dual carriageways on foot. The report acknowledges that the figures are high-level estimates. Carrying out the same exercise for 360 units there would be an additional 5 NMU trips per hour across the junction for leisure trips from 09:00 – 16:00.
- 1.42 As can be seen these figures are very low, RPS do not think it would be necessary to make any changes for this level of impact.

Conclusion

- 1.43 In conclusion, this technical note has addressed the key points raised by National Highways regarding the transport considerations for the proposed residential development at the former Huncoat Power Station site. Provides further information on trip distribution through the National Highways assets and concludes that the level of change does not justify further detailed analysis. A review of the previous accident analysis undertaken at the junction is also provided.
- 1.44 Further detailed information and evidence on these transport matters will be provided in the Transport Assessment submitted as part of the updated planning application.

Appendices

Appendix 1 – National Highways Response



**National Highways Planning Response (NHPR 22-12)
Formal Recommendation to an Application for Planning Permission**

From: Amy Williams – Divisional Director
Network Delivery and Development
North West Region
National Highways
planningNW@highwaysengland.co.uk

To: Hyndburn Borough Council FAO: Elizabeth Thornber

CC: transportplanning@dft.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: 11/21/0657

Location: Huncoat Power Station Altham Lane Altham BB5 5US

Proposal: Proposed redevelopment for up to 451 residential units, together with associated landscaping, open space, access and infrastructure.

National Highways Ref: 93490

Referring to the consultation on a planning application dated 16th December 2021 referenced above, in the vicinity of the A56 trunk road and M65 motorway that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection;~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B ~~is~~ / is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

¹ Where relevant, further information will be provided within Annex A.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningNW@nationalhighways.co.uk.

Signature: 	Date: 06/06/2025
Name: Lindsay Alder	Position: Spatial Planner
National Highways: 9th Floor, Piccadilly Gate, Store Street, Manchester M1 2WD	

Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommended Non-Approval

It is recommended that the application should not be approved until at least 29th September 2025.

Reason

Insufficient information provided with the application to enable National Highways to form a view on this proposal. The information that is provided is not fully compliant with either DfT Policy Circular 01/2022 'The strategic road network and the delivery of sustainable development', or our previous pre-application advice comments dated January 2021 and June 2021 respectively for this site.

National Highways comments on proposals

National Highways is unable to provide a final view on this application for the following reasons:

- The Transport Assessment (TA) has not been scoped out with National Highways, and so the assessment parameters for this development have not been agreed.
- As the TA has not been scoped, the TA makes no reference to National Highways' key policy guidance documents DfT Circular 01/2022, or the Strategic Road Network: Planning for the Future (2023), and so the assessments in the TA are not aligned to the required assessment policies outlined in these documents.
- Junction 8 of the M65 motorway is not included in the assessment study area, so no assessment is provided in terms of operational performance or safety. An understanding of the development impact at this location is essential given the proximity of the proposed development and the performance of how this junction operates. The TA should therefore present traffic flow diagrams and operational assessment of the junction which display the impact of the proposed development upon this junction, in accordance with the assessment requirements outlined in the aforementioned policy guidance documents. This should also include a full safety analysis based upon STATS19 reporting.
- Further information is needed regarding the development traffic forecasts. Although the trip generation is based on trip rates that both National Highways has been sighted on, Table 5.7 of the TA presents a summary of the Census Journey to Work Origin / Destination data which underpins the trip distribution. The TA suggests that this is consistent with the technical evidence which underpins the Huncoat Masterplan, however National Highways have not been sighted on these Census outputs, nor any traffic impact assessment work relating the SRN associated with the Huncoat Masterplan. The developer's transport consultant, RPS, should present the full census data outputs for review, and also provide evidence to justify the routing of traffic through the network.

- Given that the development traffic forecasts are still to be confirmed, no further comment can be made on the operational assessments which RPS have presented in the TA for the A56 / A679 dumbbell roundabouts.
- The TA provides a description of the existing provision for pedestrians across the A56, including the crossing just to the south of M65 Junction 8, however no further evidence is provided. There are two public rights of way in the vicinity of the proposed development (Footpaths 53 and 39) that cross the A56 at-grade. The TA should consider the existing pedestrian demand at these locations, the forecast increase in demand at these locations generated by the proposed development, and the suitability of the existing provision for the forecast demand.
- No information or assessment is provided in relation to surface water drainage and the use of existing any existing watercourses with culverts under the SRN downstream of the development.

National Highways' Conclusion & Formal Recommendation

Given the absence of an appropriate level of information and assessment with this application as submitted, National Highways is not in a position to provide a final view on the application at this time.

Our formal recommendation to Hyndburn Borough Council is that this application is not approved until at least 29th September 2025 so as to allow time for the applicant to undertake the tasks required that are essential to understanding the impacts of this proposal upon the SRN. Should we be able to form a final view on this application before this date, the hold on its determination may be lifted.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

**National
Highways
6th
June
2025**

Appendix 2 – Distribution Flow Diagram

Arriving
Departing

- A679 Burnley Road (West)
- M65 (East)
- A6008
- M65 (West)
- A56 Accrington Bypass (South)
- Altham Lane
- Whinney Hill Road (West)
- A679 Burnley Road (West)
- Burnley Lane

